

UNITED STATES DISTRICT COURT
District of Minnesota

UNITED STATES OF AMERICA,

INDICTMENT

	Plaintiff,	18 U.S.C. § 1467
v.		18 U.S.C. § 1470
		18 U.S.C. § 2251(a)
		18 U.S.C. § 2251(e)
NATHAN MILLER DOBBELMANN,		18 U.S.C. § 2252(a)(1)
	Defendant.	18 U.S.C. § 2252(b)(1)
		18 U.S.C. § 2253(a)
		18 U.S.C. § 2260A

THE UNITED STATES GRAND JURY CHARGES THAT:

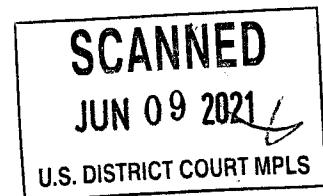
COUNT 1

(Attempted Production and Production of Child Pornography)

On or about May 1, 2020, in the State and District of Minnesota, the defendant,

NATHAN MILLER DOBBELMANN,

having previously been convicted under the laws of the State of Minnesota relating to abusive sexual conduct involving a minor, namely a conviction on or about February 8, 2008, in Winona County, Minnesota, did employ, use, persuade, induce, entice, and coerce Minor 1 to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, namely, a visual depiction of the anus and vagina of an individual purported to be Minor 1. This visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).



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COUNT 2

(Attempted Production and Production of Child Pornography)

On or about October 30, 2020, in the State and District of Minnesota, the defendant,

NATHAN MILLER DOBBELMANN,

having previously been convicted under the laws of the State of Minnesota relating to abusive sexual conduct involving a minor, namely a conviction on or about February 8, 2008, in Winona County, Minnesota, did employ, use, persuade, induce, entice, and coerce Minor 2 to engage in sexually-explicit conduct for the purpose of producing a visual depiction of such conduct, namely a visual depiction of the anus and vagina of an individual purported to be Minor 2. This visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 3

(Distribution of Child Pornography)

On or about September 23, 2020, in the State and District of Minnesota, the defendant,

NATHAN MILLER DOBBELMANN,

having previously been convicted under the laws of the State of Minnesota relating to abusive sexual conduct involving a minor, namely a conviction on or about February 8, 2008, in Winona County, Minnesota, did knowingly distribute a visual depiction using a means and facility of interstate and foreign commerce, and that was shipped

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and transported in and affecting interstate and foreign commerce, by any means including by computer, and the production of such visual depiction involved the use of a minor engaging in sexually-explicit conduct, and such visual depiction is of such conduct, namely, a computer file identified as FQTRXXXX.MP4, a video approximately six minutes and six seconds long depicting Minor 3 in poses of sexually explicit nudity and masturbating, all in violation of Title 18, United States Code, Sections 2252(a)(1) and 2252(b)(1).

COUNT 4

(Transfer of Obscene Material to a Minor)

On or about August 11, 2020, in the State and District of Minnesota, the defendant,

NATHAN MILLER DOBBELMANN,

using a means and facility of interstate commerce, did knowingly transfer an obscene matter to Minor 4, who had not attained the age of 16 years, knowing that Minor 4 had not attained the age of 16 years, namely, a computer file identified as chat~media_v4~2020-08-11-12-46-28UTC~iliverichously~[Minor 4's account ID]~saved~b~EiQSFUFiME9GXhHZ290ODBIU2dheGVpeRoAGgAyAQRIA1AEYAE~v4.jpeg, an image depicting an erect adult penis, and accompanying sexual text, all in violation of Title 18, United States Code, Section 1470.

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COUNT 5

(Commission of a Felony Offense by a Registered Sex Offender)

From at least in or about March 2020 through in or about October 2020, in the State and District of Minnesota, the defendant,

NATHAN MILLER DOBBELMANN,

a person required by Minnesota law to register as a sex offender at all times relevant to this indictment, committed felony offenses involving Minors 1, 2, 3, and 4, as charged in Counts 1 through 4 of this indictment, all in violation of Title 18, United States Code, Section 2260A.

FORFEITURE ALLEGATIONS

Counts 1 through 4 of this Indictment are incorporated here for alleging forfeitures pursuant to Title 18, United States Code, Sections 1467(a) and 2253(a).

Upon conviction of any of Counts 1 through 3, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

(1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, United States Code, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110 of Title 18, United States Code;

(2) any property, real or personal, constituting, or traceable to gross profits or other proceeds obtained from such offense; and

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(3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property, including but not limited to the following items:

- a. Avenda QS5509A cell phone, IMEI 357485093171744; and
- b. Samsung Galaxy SM-A215U cell phone, IMEI 354232111724457.

Upon conviction of Count 4, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 1467(a):

(1) any obscene material produced, transported, mailed, shipped, or received in violation of Title 18, Chapter 71;

(2) any property, real or personal, constituting, or traceable to gross profits or other proceeds obtained from such offense; and

(3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense, including but not limited to the following items:

- a. Avenda QS5509A cell phone, IMEI 357485093171744; and
- b. Samsung Galaxy SM-A215U cell phone, IMEI 354232111724457.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States reserves the right to seek forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 1467(b) and 2253(b).

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A TRUE BILL

Acting United States Attorney

Foreperson